

PD-0677-21

**TAYLOR COUNTY COURTHOUSE
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January 18, 2022

PD-0677-21
COURT OF CRIMINAL APPEALS
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FILED
COURT OF CRIMINAL APPEALS
1/25/2022
DEANA WILLIAMSON, CLERK

Hon. Deana Williamson, Clerk of the Court
Texas Court of Criminal Appeals
PO Box 12308, Capitol Station
Austin, Texas 78711

RE: Request for Oral Argument– PD-0677-21
Harold Gene Jefferson v. State of Texas
Appellate Case Number: 11-18-00184-CR
Trial Court Case Number: 20,708-B

Ms. Williamson:

Appellant's petition for discretionary review, granted on December 8, 2021, requested that the court grant oral argument, which was denied. The State also believes that oral argument would be helpful to the Court, and would respectfully request that the Court grant oral argument.

Appellant's petition involves questions of both statutory interpretation of Tex. Code Crim. Proc. Ann. art. 28.10 and whether the trial court abused its discretion in determining that trial counsel was not constitutionally ineffective in proceeding to trial with an indictment amended under that provision. The State would submit that the latter question in particular presents issues of both law and fact that lend themselves to both written brief and oral argument. The Court's decision-making process will benefit from a frank discussion of what occurred in the trial court, what actions trial counsel did and did not take, and the reasoning behind those decisions. The State accordingly joins Appellant's request for oral argument.

Thank you very much for your time. If you need to contact me for any reason please do not hesitate to do so.

Sincerely,

/s/ Britt Lindsey
Britt Houston Lindsey
Assistant District Attorney
Appellate Division

CC: Jacob Blizzard
Sarah Durham
Attorneys for Appellant

Stacy Soule
State Prosecuting Attorney

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Associated Case Party: HaroldGeneJefferson

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Associated Case Party: The State of Texas

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